Case 1:21-cr-00271-PAC Document 27 Filed 04/21/22 Page 1 of 1

Federal Defenders OF NEW YORK, INC.

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April 19, 2022

BY ECF AND EMAIL

Honorable Paul A. Crotty United States District Judge Southern District of New York 500 Pearl Street Room 1350 New York, New York 10007 4/21/2022
The May 9 sentencing will proceed remotely via video. SO ORDERED.

Re: <u>United States v. Robert Russo</u>

21 Cr. 271 (PAC)

Dear Judge Crotty,

I respectfully write on behalf of my client Robert Russo, to request that his sentencing hearing scheduled for May 9, 2022, be conducted as a remote proceeding. Mr. Russo makes this request because he has a condition called Diabetic Neuropathy which is damage to the nerves in his legs and feet caused by diabetes. Mr. Russo receives medication for this condition. Mr. Russo would like a remote proceeding because it is the policy of Essex County jail where he is held, to transport prisoners in shackles including leg irons. These shackles and leg irons exacerbate the pain from his medical condition and he seeks to avoid this in what would be a lengthy round trip between New Jersey and Manhattan for a court appearance.

Respectfully submitted,

Robert M. Baum

Assistant Federal Defender

cc: Jane Chong, Esq.

Assistant United States Attorney